

Monday 15 December 2025

Complaint on potential conflict of interest regarding Jörgen Warborn MEP

Dear Honourable Members of the Advisory Committee on the Conduct of Members,

As organisations dedicated to safeguarding democracy and accountability within the European Union, we are writing to raise our serious concerns regarding the outside interests of MEP Jörgen Warborn. We believe Mr Warborn's position as President of SME Europe, as well as his role as rapporteur for the report on "certain corporate sustainability reporting and due diligence requirements (2025/0045(COD))", constitutes a possible conflict of interest as outlined in Article 3(1) of the Code of Conduct.¹ We therefore urge you to take these concerns into consideration and to open an immediate investigation into potential conflicts of interest.

Mr Warborn's side activity and background

Mr Warborn serves as the President of the organisation *Small and Medium Entrepreneurs of Europe* (SME Europe). He attests to this in his [declaration of private interests](#); he is listed as President on the [SME Europe website](#); and the [official Belgian registry](#) records him as having been on the Board of SME Europe since 29 June 2020.

SME Europe is a legal entity in Belgium, registered as an *association internationale sans but lucratif* (non-profit). According to its [website](#), SME Europe is "the biggest political organisation in Europe that operates for the rights of small and medium sized enterprises, creating and developing a common European SME friendly policy". The organisation is [registered](#) as an interest representative on the EU's Transparency Register, has carried out lobby meetings, and actively seeks to shape EU policies in a more SME friendly way, as indicated in its entry.

Although a separate legal entity, and neither a European political party nor foundation, SME Europe effectively operates as a lobbying wing of the European People's Party. As set out in its [statute](#), SME Europe "is the independent political

¹ Article 3(1) of the Code of Conduct: "A conflict of interest exists where the exercise of the mandate of a Member of the European Parliament in the public interest may be improperly influenced for reasons involving his or her family, emotional life or economic interest, or any other direct or indirect private interest."

network of Christian- Democrat and Conservative political and pro-business organization. Its main objective is to help shaping EU policy in a more SME friendly way.”

Mr Warborn therefore formally presides over a legal entity, formally registered in Belgium, which is listed as lobby organisation on the EU’s Transparency Register, with the [stated goal](#): “Our top priority is for **our Board**, Senators, and Working Group Chairs to **shape and refine EU legislation** that supports SMEs throughout Europe.” (emphasis added)

Mr Warborn’s work on corporate sustainability reporting and due diligence requirements

Mr Warborn is a substitute of the European Parliament’s Committee on Legal Affairs (JURI) and the rapporteur for the report titled “certain corporate sustainability reporting and due diligence requirements [\(2025/0045\(COD\)\)](#)”, a Commission legislative proposal aimed, among other objectives, at reducing the reporting burden on smaller companies.² Upon his appointment as rapporteur, in his [Declaration on Awareness of Conflicts of Interest](#) of 20 March 2025, Mr Warborn attested to not being aware of any conflict of interest in relation to that file.

In his original [draft Committee report](#), he proposed amendments that would have narrowed the scope of companies subject to certain reporting obligations further than the Commission proposal.³

During a plenary debate on this file on [22 October 2025](#), Mr Warborn urged MEPs to vote in favour of the mandate for interinstitutional negotiations in order to “deliver clarity for European businesses”, focusing *inter alia* on “small businesses, medium-sized ones”.

In 2025, both immediately before and after being appointed rapporteur, Mr Warborn participated in multiple [events](#) organised by SME Europe. On 7 February 2025, he [spoke](#) at an event organised by SME Europe at the European Parliament, where he “stressed the pressing need to reduce regulatory burdens to drive business growth in Europe” and “pointed out that [the scope of the Omnibus Package] remains limited, covering only a fraction of sectors and policies.”

² See the [Commission Proposal](#), p 4.

³ See Mr Warborn’s [draft report](#): Amendment 25.

On 29 April 2025, he [spoke](#) at SME Europe's Economic Leadership Forum. The corresponding [agenda](#) denoted him as both *President of SME Europe* and *Co-Chair SME Circle* for one agenda point, and, three hours later, as *rapporteur for the First Omnibus Simplification Package* for a separate agenda point.

SME Europe's social media frequently portrays Mr Warborn in ways that blur the line between his role as an MEP and his role as President of SME Europe, creating ambiguity about the capacity in which he is acting (examples [here](#) and [here](#)).

Our conclusions

We believe Mr Warborn's position as President of SME Europe, in conjunction with his role as Rapporteur for the aforementioned dossier, may constitute a possible conflict of interest as outlined in Article 3 (1) of the Code of Conduct.

Article 3(1) of the Code of Conduct stipulates that a conflict of interest arises when the exercise of a Member's mandate in the public interest may be improperly influenced by any economic or private interest. Likewise, according to the General Court in [Case T-115/13](#), "the concept of a conflict of interest [relates] [...] also to a situation in which the interest identified may, in the eyes of the public, appear to influence the impartial and objective performance of [the public official's] official duties". We believe this threshold may be met here. As President of SME Europe, Mr Warborn could be expected to represent the organisation's interest, which may call into question his impartiality and objectiveness in the performance of his duties as rapporteur and lead negotiator for Parliament on the report on certain corporate sustainability reporting and due diligence requirements (2025/0045(COD)).

The public is liable to perceive Mr Warborn as acting in a dual role: on the one hand, as President of an entity whose primary purpose is to influence EU policymaking in favour of SMEs, as per its registration on the EU lobbying register; and on the other hand, as the lead MEP and rapporteur for the report on corporate sustainability reporting and due diligence requirements.

According to Articles 3(2) and 3(3) of the Code of Conduct, MEPs shall make every reasonable effort to detect conflicts of interest and endeavour to resolve them. In addition, if unable to resolve it, MEPs shall make sure that the private interest concerned is declared in accordance with Article 4. To our knowledge, this has not been undertaken by Mr Warborn as of yet, although it can reasonably be assumed that his positions are of interest to SME Europe and that he is aware of this. In

addition, to our knowledge, he did not declare any conflict of interest before speaking or voting in plenaries.

Proposed actions

The Code of Conduct for MEPs states the following, inter alia:

"In exercising their duties, Members of the European Parliament: (a) are guided by and observe the following general principles of conduct: disinterest, integrity, openness, diligence, honesty, accountability and respect for Parliament's dignity and reputation, (b) act solely in the public interest and refrain from obtaining or seeking to obtain any direct or indirect benefit or other reward."

"A conflict of interest exists where the exercise of the mandate of a Member of the European Parliament in the public interest may be improperly influenced for reasons involving his or her family, emotional life or economic interest, or any other direct or indirect private interest."

"Members shall make every reasonable effort to detect conflicts of interest. Member who becomes aware of having a conflict of interest shall immediately endeavour to resolve it. If unable to resolve it, the Member shall make sure that the private interest concerned is declared in accordance with Article 4. Without prejudice to paragraph 2, Members shall disclose, before speaking or voting in plenary or in one of Parliament's bodies, any conflict of interest in relation to the matter under consideration, where such conflict is not evident from the information declared pursuant to Article 4. Such disclosure shall be made orally by intervening in the sitting or meeting concerned."

Given the above, we ask you to investigate the following:

- The exact circumstances of Mr Warborn's side job as President of SME Europe.
- The interests of SME Europe and how they pertain to the dossier for which Mr Warborn is the rapporteur (2025/0045(COD)).
- The extent to which Mr Warborn has declared these conflict-of-interest risks or sought advice on them from the European Parliament administration.
- The extent of the wider conflict-of-interest risks arising from Mr Warborn's work as an MEP in conjunction with his side jobs.
- The extent to which his side activities could be considered lobbying activities.

Should you find that Mr Warborn is in breach of the Code of Conduct, we trust that you will immediately take all measures to rectify the situation and levy all appropriate sanctions.

We kindly ask you to keep us informed about the progress of our complaint, in line with the recommendations of the Ombudsman in complaint. Indeed, it is essential that citizens are informed on how their complaint or signal will be addressed, including details on the process and whether, or how, the outcome will be communicated to them. We trust that due importance will be given to this recommendation.

We appreciate your consideration of this matter and look forward to your assessment.

Yours sincerely,

Transparency International EU

Corporate Europe Observatory

The Good Lobby

LobbyControl e.V.

Friends of the Earth Europe

Jordens Vänner / Friends of the Earth Sweden

European Federation of Journalists (EFJ)

GIET (Groupe International d'Études Transdisciplinaires)

Notre Affaire à Tous

Collectif Ethique sur l'Etiquette